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8 Attorneys for Allstate Insurance
Company, John Alsop Insurance Agency,
9 and Eric Alsop

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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
13

14 MONIQUE LAWLER, DARYL
LAWLER,

15 Plaintiffs,
16

17 v.

18 ALLSTATE INSURANCE
COMPANY, JOHN ALSOP
INSURANCE AGENCY, ERIC
19 ALSOP, DOES 1 through 100,

20 Defendants.
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Case No. 2:24-cv-01442-AB-SK

Hon. Andre Birotte Jr.
Courtroom 7B

**DECLARATION OF ERIC D.
ALSOP IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO
REMAND**

Date: April 19, 2024
Time: 10:00 a.m.
Dept.: 7B

Complaint Filed: January 26, 2024

1 I, Eric D. Alsop, declare as follows:

2 1. I am an Allstate insurance agent who operates through John Alsop
3 Insurance Agency. If called and sworn as a witness, I could and would competently
4 testify to all facts within my personal knowledge.

5 2. I am a licensed insurance agent with the State of California. A true and
6 correct copy of my license from the California Department of Insurance is attached
7 as **Exhibit A**.

8 3. I am an employee of John Alsop Insurance Agency, who is a party to
9 the Allstate R3001 Agency Agreement (“Agreement”) with Allstate Insurance
10 Company (“Allstate”). As an employee, I am bound by the Agreement and familiar
11 with its provisions. The Agreement is confidential and contains proprietary
12 information of Allstate. Therefore, I have attached only the relevant provisions of
13 the Agreement pertaining to my agency with Allstate to this Declaration;
14 specifically, pages 7 and 111. Under this Agreement, I am an R3001 Agent with
15 Allstate. R3001 Agents act exclusively as agents for Allstate or its subsidiaries.
16 Under the Agreement, Allstate’s subsidiaries include Allstate Indemnity Company,
17 Allstate Motor Club, Inc., Allstate Northbrook Indemnity Company, and Allstate
18 Property and Casualty Insurance Company. A true and correct copy of the relevant
19 portions of the R3001 Agreement is attached as **Exhibit B**.

20 4. Under the Agreement’s “Invantage” provision, I am able to sell other
21 company’s insurance only with the express written approval of Allstate. This
22 typically happens in circumstances where Allstate does not write insurance. We
23 would never place insurance that competes with Allstate. Moreover, at all times, I
24 remain exclusively an R3001 agent with Allstate. I must remain exclusively an
25 R3001 agent with Allstate in order to participate in this program. A true and correct
26 copy of the “Invantage” provision of the Agreement is located at pages 111 through
27 113 of Exhibit B.

1 5. John Alsop Insurance Agency, my employer, assisted Monique Lawler
2 and Daryl Lawler in obtaining a homeowners insurance policy with Allstate, which
3 is the subject of their complaint. I am familiar with the policy's provisions through
4 my work with the Lawlers and my work as an R3001 agent for Allstate. The first
5 page of the policy's declarations states: "Your Allstate agency is Alsop &
6 Associates." A true and correct copy of the Lawler's policy with Allstate is attached
7 as **Exhibit C**.

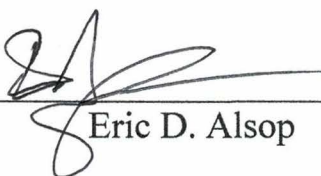
8 6. Neither I, nor John Alsop Insurance Agency, ever served as an
9 insurance broker for Monique Lawler and Daryl Lawler. At all times during my
10 dealings with the Lawlers, either individually or through my agency John Alsop
11 Insurance Agency, I acted exclusively as an agent for Allstate. This included, but is
12 not limited to, assisting the Lawlers with obtaining a homeowners insurance policy
13 with Allstate, which is the subject of their complaint. I never told the Lawlers that I
14 or my agency would act as their insurance broker. To the contrary, I held myself
15 and my agency out as an Allstate insurance agent to them and others. For example,
16 my business cards and webpage ([https://agents.allstate.com/alsop--associates-](https://agents.allstate.com/alsop--associates-insurance-agency-montclair-ca.html)
17 [insurance-agency-montclair-ca.html](https://agents.allstate.com/alsop--associates-insurance-agency-montclair-ca.html)) show that I hold myself and my agency out as
18 an Allstate insurance agent. Similarly, I use an Allstate email account with the
19 @Allstate.com address when communicating with insureds.

20 7. At no point did I or John Alsop Insurance Agency enter into a contract
21 with the Lawlers. Nor did I or my agency agree to provide, or assume a duty to
22 provide, claim handling services to the Lawlers in connection with their water claim
23 with Allstate. That is a claim handling function provided by Allstate's claims
24 adjusters, not its sales agents, such as myself and my agency.

25 I declare under penalty of perjury under the laws of the United States of
26 America that the foregoing is true and correct.

27 Executed on 3/27/24, at Montclair, California.

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Eric D. Alsop